

February 17, 2023

**Via ECF**

The Honorable Philip M. Halpern  
United States District Judge  
U.S. District Court, Southern District of New York  
500 Pearl Street, Room 1950  
New York, NY 10007

Re: ***Ramirez v. Marriott International, Inc., et al***, Case No. 7:20-cv-02397-PMH;  
**Plaintiff's Letter Regarding Status of Settlement**

Dear Judge Halpern:

Plaintiff writes to request guidance from the Court as to the status of the decision regarding attorneys' fees and how the Parties should proceed in the interim. Defendants have had an opportunity to review this letter, and do not oppose its contents.

On November 2, 2022, the Court issued an order approving the class and collective settlement reached in this case, except as to attorneys' fees, which the Court indicated it would consider separately. *See* Dkt. 140. The Settlement Agreement provides for notice be sent to the Class and Collective Members informing them of the settlement and their ability to object or opt out of the settlement. *See* Dkt. 135-1. The Notice approved by the Court also informs Class and Collective Members of the amount of attorney's fees being sought. *Id.* Because of this, the Parties have been unable to proceed with the administration of the settlement without a ruling from the Court on the attorneys' fees issue.

On December 2, Class Counsel emailed Defendants' counsel proposing that the Parties modify the notice to indicate the total award that Class Counsel has requested, and that it is still under review, to allow the settlement administration to proceed. Defendants' counsel was not agreeable because the Court's ruling regarding the fees and costs may impact the settlement payments to participating Class members, and issuing the Notice would trigger other deadlines, including payments, that may come to pass before a decision is made on fees.

As such, at this time, Plaintiff requests guidance from the Court as to the status of the decision and how the Parties should proceed in the interim in order to provide notice of the Settlement to the Class and Collective Members.

Respectfully submitted,

Schneider Wallace  
Cottrell Konecky LLP

/s/ Ori Edelstein  
Ori Edelstein

*Attorney for Plaintiff and the  
Class and Collective members*

cc: All Counsel of Record (via ECF)